

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her
minor child,

Plaintiff,

vs.

MARTY SMALL, SR., in his official capacity
as Mayor of Atlantic City, New Jersey, and
individually,

LA'QUETTA SMALL-FRAZIER, in her
official capacity as Former Principal of
Pennsylvania Avenue School, and individually,

BARRY CALDWELL, in his official capacity
as current Superintendent of the Atlantic City
School District,

PAUL A. SPAVENTA, in his official capacity
as former Interim Superintendent of the
Atlantic City School District,

ATLANTIC CITY BOARD OF
EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Civil Action No. 1:21-cv-11189-JHR-AMD

**APPLICATION FOR EXTENSION OF
TIME TO ANSWER, MOVE, OR
OTHERWISE REPLY**

Application is hereby made for a Clerk's Order extending time within which defendant, La'Quetta Small-Frazier, may answer, move, or otherwise reply to the amended complaint filed by plaintiff herein and it is represented that:

1. No previous extension has been obtained with respect to filing an answer or moving to dismiss the amended complaint.

2. On July 27, 2021, defendant filed a motion to dismiss the original complaint. See Document No. 28.

3. On August 16, 2021, plaintiff filed and served defendant with an amended complaint, thereby mooted defendant's motion to dismiss. See Document No. 32.

4. Time to Answer, Move or otherwise Reply expires on August 30, 2021.

5. Pursuant to L. Civ. R. 6.1(b), defendant requests that the time to answer or move to dismiss the amended complaint be extended for a period of fourteen (14) days, i.e., until September 13, 2021.

By: /s/ Jeffrey L. Shanaberger

Jeffrey L. Shanaberger, Esq.

Attorney ID: 20931983

Hill Wallack LLP

21 Roszel Road

Princeton, NJ 08543-5226

ORDER

The above application is ORDERED GRANTED. Defendant La'Quetta Small-Frazier's time to answer, move or otherwise reply to the amended complaint is extended to

_____.

ORDER DATED: _____

WILLIAM T. WALSH, Clerk

By: _____
Deputy Clerk